

ORIGINAL

Secretary  
Mail Stop 1170  
Federal Communications Commission  
Washington, DC 20554

Petition of the Community       }  
Broadcasters Association       } RM-9260  
For Establishment of a "Class   }  
A" Television Service       }

To: The Commission - Mail Stop 1170

COMMENTS BY VIKING COMMUNICATIONS,  
INC., BY ITS PRESIDENT, PHILIP R. DE SANO, 10  
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These comments are filed by Viking Communications,  
Inc., operator of low power television station, WRIW-  
LP, located in Providence, R.I. As a displaced low  
power television station operator, Viking would like to  
express its support for establishment of permanent "Class  
A" service. Over the past year, it became evident from  
the published digital channel allocation tables that  
WRIW-LP, channel 23, would be displaced by a full

power station. When a station such as WRIW-LP does not have permanent status, it is a restraint on the operation of the station which in turn prevents the station from doing its best in providing for the community needs.

WRIW-LP still remains under a cloud of extinction as it awaits review of its application for a new channel assignment. When a television stations future existence is in doubt, as WRIW-LP is, cable TV operators will not carry the station, the station cannot enter into contracts for programming, employees look elsewhere for work, and advertisers are not interested in the station.

If WRIW-LP is able to overcome these adversities and be assigned another channel, it has to then purchase new equipment. Of all the media in this country, the low power industry is least able to afford the cost of new

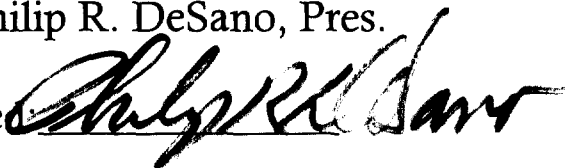
equipment. For the above reasons, Viking is in favor of permanent "Class A" service, because no company should have to endure this devastating process, not even once!

WRIW-LP is located in Rhode Island where Cox Communications owns 95% of the cable TV systems.

The cable TV penetration in Rhode Island is approximately 79%. WRIW-LP will be operating for 5 years as of June 6, 1998, however, Cox refuses to carry it. It is difficult to operate a low power television station that can be viewed by only 21% of Rhode Island. As long as low power television does not have must carry rights, it should remain under the bare minimum of regulation, if permanent "Class A" service is granted.

Respectfully submitted,  
Viking Communications, Inc.  
by Philip R. DeSano, Pres.

Signed



Dated: May 5, 1998.